From: Jump, Christine
To: "SMITH, MARTIN L"; "Michael Stephenson"
Subject: FW: april 1984 inspection rpt
Date: Thursday, May 08, 2014 10:10:00 AM
Attachments: april 1984 inspection rpt.pdf

Attached is the final report on the inspection that the photos are from. I will be forwarding a couple of maps with numbers and directional arrows showing where the photos were taken and then some additional photos.

In the report, comment 19 on page 7 is enlightening.

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-----Original Message-----
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REPORT OF RCRA COMPLIANCE INSPECTION

AT

REID SUPPLY COMPANY

WICHITA, KANSAS

EPA I.D. NUMBER: KSD007246846

APRIL 5-6, 1984

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Air and Waste Management Division (ARWM), a RCRA Compliance Evaluation Inspection was performed at Reid Supply Company in Wichita, Kansas, on April 5-6, 1984. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Reid Supply Company:
David G. Trombold, Hazardous Waste Coordinator
Charles P. Trombold, Process Engineer

Kansas Department of Health and Environment (KDHE):
Dale T. Stuckey, Sanitarian, South Central District Office

U.S. Environmental Protection Agency (EPA):
John W. Bosky, Environmental Engineer

INSPECTION PROCEDURES

On the morning of the inspection (April 5, 1984), Mr. David G. Trombold, Hazardous Waste Coordinator for Reid Supply Company, was contacted and arrangements were made to meet him at the facility location. The actual inspection began at around 10:00 AM, April 5, 1984. The facility representatives during the entire inspection were David Trombold, and Mr. Charles P. Trombold, Process Engineer. Prior to the inspection, I presented them with my EPA credentials and explained the purpose of the inspection and the procedures that I would follow. The inspection consisted of a discussion of the facility operations and waste generation, a review of the facility's waste management plans, programs and records, and a visual inspection of

the facility operating and waste management areas. The actual inspection at the facility concluded at around 6:30 PM, April 5, 1984. At 8:30 AM, April 6, 1984, the inspection team met again with the facility representatives at Reid's general offices located at 911 East Indianapolis in Wichita. At this time, I summarized and reviewed my findings and recommendations with the facility representatives. I next provided David Trombold with a RCRA Inspection Confidentiality Notice which he signed. A copy of this document is attached. I then presented David Trombold with a Notice of Violation which he reviewed and signed as acknowledgement of receipt. A copy of this Notice is attached. In addition, photocopies were obtained of several facility documents, which are attached to this report, as well as a document receipt.

FACILITY DESCRIPTION

The Reid Supply Company in Wichita, Kansas, is primarily a distributor of industrial chemicals and solvents. Solvents and acids are shipped to the facility in bulk and stored on-site in tanks. The operation employs around 35 persons and is open between 8:00 AM and 4:30 PM, Monday through Friday. As a service to their customers, Reid is accepting spent solvents generated off-site and is either reclaiming the solvent, blending the solvent into a fuel mixture, or sending the waste to another off-site facility. The majority of spent solvent arrives in drums, but bulk truck shipments have been accepted in the past (around 4 tank trucks per year). Reid officials stated that an estimated 65 customers send spent solvent to their facility on a regular basis, about half of which are classified as small-quantity generators. Reid picks up drums of spent solvent with their own truck using a hazardous waste shipping manifest. Reid officials stated that they usually charge a minimum fee for recycling or disposing of spent solvents, but that the spent solvent from some large generators is picked up free of charge. After drums of spent solvent arrive at the facility, the waste is classified and a decision is made on how to handle the material. A flowchart outlining the handling procedures and options is attached to this report. In the past, Reid has operated separate chlorinated and non-chlorinated solvent reclaiming systems, but has now shut down the chlorinated system. The following outlines the handling procedure for non-chlorinated solvents to be reclaimed:

1. Spent solvents are pumped from drums through a pressure filter with a 200 micron filter bag. Solvent goes from the filter system to a settling tank.

2. The settling tank is filled (1000-gallons) and the spent solvent is allowed to settle overnight (solids and water settle to bottom). Any settled material is removed the next day and the remaining solvent is pumped to a 1300-gallon transfer tank.

3. The transfer tank is used to transport the solvent from the south plant (located inside Trombold Industrial Park - drum processing area, settling tank, filter, vertical storage tanks and hazardous waste storage warehouse are at the south plant) to the north plant (location of chemical warehouse, still feed tanks and still system). The spent solvent is then pumped into one of two 750-gallon tanks which feed the still system.

4. The reclaiming system being used consists of a continuous-feed steam jacketed still with a maximum internal capacity of around 180 gallons. Facility officials estimated that this still can process around 500 gallons of spent solvent in an eight-hour shift. Recovered solvent is either drummed directly off of the condenser system or is pumped through a 100-gallon check tank into a bulk solvent storage tank. Reid uses cold water in the still condenser system on a "once-through" basis and does not use any type of chiller to reduce the condenser temperature. At the end of each shift, still bottoms are removed and placed into one of the two vertical storage towers/tanks located at the south plant (total tower capacity is 8500 gallons). The still bottoms are ultimately disposed of by fuel blending.

Reid mixes various hazardous wastes for ultimate use as a fuel supplement. This mixture is shipped to Systech Corporation (EPA I.D. Number: KSD980633259) for use at the General Portland facility in Fredonia, Kansas. Wastes which are blended into this mixture include all still bottoms generated on-site, solvents received from off-site that are not reclaimable, solids and water removed from the settling tank and solids removed from the filter system. Facility officials stated that a composite sample is formed of all wastes to be blended together. This sample is then shipped to Systech Corporation for BTU, PCB and chloride analysis. It was further stated that the minimum mixture heat value accepted by Systech is 10,000 BTUs/pound. Approximately once per month, a truckload of this waste mixture is transported to Systech using a hazardous waste manifest. A review of the manifest file indicates that around 46,000 gallons of the waste mixture has been sent to Systech for use as a fuel since this practice began in May 1983. Prior to using Systech for the disposal of this waste mixture, facility officials stated that it had been sent to Vacuum Pressure in Oklahoma.

FINDINGS AND OBSERVATIONS

1. Reid Supply Company in Wichita, Kansas, submitted a Notification of Hazardous Waste Activity on July 1, 1980. This Notification listed them as a transporter and a TSD facility. On November 17, 1980, a Part A Permit Application was received for this Reid facility. On June 8, 1981, Reid submitted a request to amend their Notification to include generator status. On September 27, 1982, the U.S. EPA and the KDHE requested Reid to submit their Part B (final) Permit Application within 6 months. An amended Part A Permit Application was submitted by Reid on November 9, 1982, and a revised Notification was submitted by Reid on November 23, 1982. Reid submitted their Part B Permit Application on March 25, 1983.

2. A compliance evaluation inspection at Reid was conducted by KDHE personnel on September 2, 1981. A September 4, 1981, letter to Reid regarding this inspection discusses program deficiencies found (incomplete training program, lack of inspection log, lack of closure plan) and the poor management of, as well as, the excessive number of drums of hazardous waste stored at Reid. The letter also indicates that an even larger number of drums was being stored on-site during the year previous. A follow-up

inspection was conducted by KDHE personnel on October 5, 1981. The inspection report indicated that Reid was substantially in compliance and that plans were underway to reduce the excessive inventory of hazardous waste. A June 25, 1982, inspection of Reid's manifest files by an EPA contractor found numerous deficiencies or errors. These were outlined in a September 7, 1982, letter to the facility. On August 3, 1982, KDHE personnel conducted another compliance evaluation inspection at Reid. Deficiencies found during this inspection included the lack of proper training records, the lack of an inspection log and an excessive quantity of hazardous waste being stored at the facility. An August 25, 1982, letter to Reid outlined these deficiencies and requested that they be corrected within two months.

3. Reid has recently implemented a detailed waste analysis program. The program will consist of detailed waste analysis data provided by all large quantity generators backed up by "fingerprint" analyses of all shipments of these wastes by Reid using a gas chromatograph. Prior to the development of this program, the only waste analysis information developed by Reid was historical data (type of solvent as stated by generator), specific gravity, and flask distillation ranges. The previous system will still be used for small quantity generators unless the waste identification is found to be questionable. It did not appear as though this program had been fully implemented at the time of this inspection, since the waste analysis information observed in the facility records was very sketchy. Since October 1983, all new wastestreams to be used by Reid in the fuel supplement mixture have been analyzed by Systech for chlorides, PCBs and heat value.

4. Reid officials stated that they form a composite sample of each waste shipment received by taking a small quantity of material from each drum in the load. They further stated that prior to blending wastes into a fuel supplement mixture, a "master" composite is formed using the composite samples from each waste shipment to be blended and samples of facility generated wastes which are also to be blended into the mixture. This "master" composite is then sent to Systech for analysis to ensure that the mixture's heat value will exceed their minimum specification of 10,000 BTUs per pound. Once the sample is analyzed and approved by Systech, the wastes to be mixed are pumped into a 750-gallon motor-agitated blender and then pumped into one of the vertical towers/tanks located at the drum processing area (total tower capacity equals 8500 gallons).

5. Reid officials stated that heat value tests have only been run on the following wastestreams:

- Drycleaner (perchloroethylene) still bottoms residue to be blended into a fuel mixture (lowest value = 10,200 BTUs/pound). It was stated that this material is the only chlorinated waste that is blended into the mixture.

- Composite of all wastes to be blended into the fuel mixture (final mixture heat value).

- New wastestreams from old generators and all wastestreams from new generators which are to be blended into fuel supplements, starting as of October 1983.

Reid officials also stated that heat value testing has not been conducted on the following wastestreams which are blended into a fuel supplement:

- Still bottoms residue generated from on-site solvent reclamation.

- Water and solids from settling tank operation (estimated by Reid to be around 20 gallons per 1000 gallon batch of spent solvent).

- Solids removed from the spent solvent filter operation (estimated by Reid to be around 1/2 gallon per 1000 gallons of spent solvent).

- Wastestreams that were being accepted by Reid prior to October 1983.

Based on the above information, it does not appear that Reid has obtained sufficient waste analysis information on all separate wastestreams to properly dispose of these wastes by fuel blending pursuant to 40 CFR 265.13(a.1). It is questionable whether all wastestreams being blended into the fuel supplement mixture have a sufficient heat value to allow for legitimate recovery of the waste by burning as a fuel. All wastes being blended into a fuel mixture should have a legitimate heat value irregardless of the heat value of the final mixture. This policy is further detailed in an enforcement guidance document published in the March 16, 1983, issue of the Federal Register. I have attached a copy of this guidance document.

6. In the past, Reid has reclaimed chlorinated solvents using an on-site still system. Reid officials stated that they no longer recycle chlorinated solvents on-site, but still accept spent chlorinated solvents from their customers. It was further stated that these spent solvents are currently being sent off-site for solvent recovery. It was said that these solvents go to U.S. PCI. An attached manifest (dated 1/6/84) indicates that spent chlorinated solvents are going to Hydrocarbon Recyclers, Inc. in Tulsa, Oklahoma (EPA I.D. Number: OKT000632737), using U.S. PCI as a transporter.

7. After facility personnel have pumped as much liquid as possible from each drum of spent solvent, the drums are de-headed and any remaining solids and/or residue is removed by hand. Reid officials stated that this "solids" waste is being repacked into other drums for eventual disposal. It was stated that none of this solid waste has yet been disposed of off-site, but that they were working on a disposal contract with Chemical Waste Management to take this wastestream to their disposal facility in Port Arthur, Texas. It was also stated during the inspection, that in the past, some of this solids/residue waste had been blended into the waste mixture used as a fuel supplement. Empty drums are picked up by a private contractor and transported to a scrap dealer (Novick) where the drums are shredded and the metal is reclaimed.

8. Once-through cooling water used in the still condenser system is discharged to a concrete basin located in the northwest corner of the north plant (see photos #11 and 12). Facility officials stated that this basin does not discharge. During the inspection, a deteriorated drum was observed floating in this basin.

9. During the inspection, drums of liquid caustic were observed at the rear of the north plant. Reid officials stated that this solution had been used to clean the still systems and that they intended to re-use the material for future cleaning purposes (see photo #10).

10. The Reid facility is divided into what I have termed the "north plant" and the "south plant". The south plant is located inside Trombold Industrial Park and contains the drum storage warehouse, drum processing area, filter and settling tank system, blender and vertical storage towers/tanks. The north plant is actually located directly northeast of Trombold Industrial Park and contains the solvent reclaiming system. The two Reid plants are separated by a roadway leading to a Missouri-Pacific Railroad facility. It is not clear whether the north and south Reid plants are actually contiguous. One permit application has been submitted covering both plants.

11. Reid has an estimated 98 drums of paint wastes and waste thinners stored at the rear of the north plant (see photos #14-18). Reid officials stated that these drums of waste had come from Kansas Paint and that the KDHE had asked Reid not to dispose of this material because of the possibility of radioactivity (from solvent stripping of illuminated aircraft instruments). They further stated that the KDHE had checked the drums and that 15 were found to be radioactive. The radioactive waste has not yet been disposed of. Of the remaining drums of waste, around 36 have been emptied of all liquids. Many of the drums of waste at the rear of the north plant were open and/or in deteriorated condition.

12. A partial containment wall was observed around the feed tanks for the solvent recovery still system (see photos #3, 4, 5, and 9). This structure had been constructed of concrete blocks, and according to Reid officials, would be rebuilt using a latex concrete sealer.

13. Brick and/or concrete block containment structures were observed around the tanks at the south plant and around the drum storage area within the warehouse. It is questionable whether these structures would last the anticipated life of this facility (20 years), and it appeared to the inspector that the bricks and/or blocks forming the containment structures could be easily dislodged.

14. During the inspection, Reid officials stated that drums of flammable hazardous waste had previously been sent to Atwood Enterprises in Norfolk, Nebraska, for eventual disposal by incineration at Willis Pyrolizer. They further stated that of 160 drums of waste that could not be sent to Willis Pyrolizer (due to its closure), all but around 40 to 45 drums had already been returned to Reid. When asked if this was the only material intended for disposal at Willis Pyrolizer, Reid officials stated that other waste shipments had actually been sent to Willis Pyrolizer in the past, primarily paint sludges.

15. Reid had received a shipment of 61 drums of waste from Alton Packaging Corporation in Alton, Illinois. These drums were marked "Waste Solvent, N.O.S.". A sample of waste solvent had been obtained previously from Alton and was cleared by Systech for use in fuel supplement blending. After arrival, it was discovered that 29 of the 61 drums contained a defoaming agent instead of just waste solvent. However, prior to discovery of this situation, some of the waste defoaming agent was placed into the facility blender along with other waste solvents. The defoamer caused the batch of material in the blender to gum-up or polymerize in some fashion. The polymerized waste was removed from the blender and drummed. No report was filed with the U.S. EPA or the KDHE regarding this incident. Reid officials stated that they are currently considering disposal options for the polymerized waste and the remaining waste defoaming agent. It is probable that if a thorough waste sampling and analysis program had been in use at the time of this shipment, the discrepancy would have been discovered before any major problems occurred.

16. When Reid ships a load of the fuel supplement mixture to Systech, it is accompanied by a hazardous waste shipping manifest. Reid places on the manifest an estimate of the gallons in the load. Systech weighs the shipment when it arrives and informs Reid of the correct poundage. Reid then places the weight on each of the manifest copies in their file and corrects the original volume estimate. A review of these manifests shows the variance to not exceed 10%.

17. Reid is storing numerous drums (green plastic) of a mixture of phosphoric and nitric acid in front of the drum storage warehouse. Reid officials stated that although this material had originally been obtained for use at their facility, they now considered it to be a waste material and planned to eventually neutralize it on-site. During the inspection, one container of waste acid was observed that appeared to be leaking (see photo #68). This leaking drum (as well as all of the other containers of waste acid) was in close proximity to drums of waste solvent and solvent residues also stored in front of the drum storage warehouse. This appears to be common storage of incompatible wastes (refer to 40 CFR 265, Appendix V). Incompatible wastes stored in containers must be separated pursuant to 40 CFR 265.177(c).

18. During the inspection, large quantities of drums were observed along the western side of Trombold Industrial Park (see photos #114, 115 and 116). Reid officials stated that this was their empty drum storage area.

19. During the inspection, each tank used for hazardous waste management was inspected for leakage (past or present). The housekeeping was so poor around tanks located at the south plant that it was not possible to determine if any leakage had been occurring (see photos #44, 45 and 47).

20. Reid officials stated that they had not yet made any arrangements with any emergency response contractors or equipment suppliers pursuant to 40 CFR 265.37(a.3). These arrangements would probably be necessary in the event of a major spill or hazardous waste incident at Reid.

21. At the time of the inspection, there was no alarm or emergency communication equipment at the Reid facility. Although telephones were available at offices located in the north plant, Reid officials stated that there were no telephones at Reid facilities in the south plant. Reid officials further stated that telephones were available at other companies located within Trombold Industrial Park and that a two-way radio and an alarm system had been ordered.

22. Copies of the facility contingency plan have not been submitted to necessary local authorities pursuant to 40 CFR 265.53(b). Reid officials stated that facility waste and hazard information, as well as plant maps and evacuation routes, had been submitted to all of the proper local authorities.

23. Although Reid had revised its contingency plan to include a listing of all facility emergency equipment and its exact location, Reid officials stated that this information had not yet been actually attached to all of the contingency plans maintained at the facility pursuant to 40 CFR 265.52(e).

24. The following observations were made regarding the facility inspection plan and log sheets:

- The facility inspection plan addresses a "drum storage area" and "tanks". At the time of the inspection, drums of hazardous waste were being stored at numerous areas in and around the north and south plant. In addition, numerous tanks are currently in use at Reid, not all of which are regulated under RCRA. The inspection plan and log sheets should indicate specifically which areas and tanks are to be (and have been) inspected.

- The log sheets for the daily inspections of the "loading and unloading areas" and the "tank overfill prevention mechanisms" do not include a daily entry of the inspector's name and/or signature. Each individual log sheet covers an extended length of time and has a single space at the top of the sheet for the entry of one inspector's name.

25. A review of the weekly inspection log sheet dated March 30, 1984, indicates that no deficiencies or problems were observed by the Reid inspector (see attached log sheet). During the April 5, 1984, EPA and KDHE inspection, numerous drums of hazardous waste were observed at Reid that were badly deteriorated, deformed, open and/or leaking. Pursuant to 40 CFR 265.174, all containers and storage areas must be inspected at least weekly. Pursuant to 40 CFR 265.15(c) and 40 CFR 265.171, the owner or operator of a hazardous waste facility must take immediate remedial action whenever a problem is observed. It does not appear as though Reid is conducting and/or documenting inspections properly and it would appear that Reid is not taking all necessary remedial actions.

26. During the inspection, numerous drums containing hazardous waste were observed that were open (lack of top and/or top portion of drum deteriorated and/or top of drum punctured). This situation is documented in many of the attached facility photographs. Pursuant to 40 CFR 265.173(a), all containers of hazardous waste must remain closed except when material is actually being added or removed from the container.

27. During the inspection, numerous drums containing hazardous waste were observed that were in poor condition and/or badly deteriorated. This situation is documented in several of the attached facility photographs. Pursuant to 40 CFR 265.171, all hazardous waste in a container not in good condition must be transferred to a container that is in good condition.

28. During the inspection, several containers of hazardous waste appeared to be (or had been) leaking (see photos #35, 53 and 68). Pursuant to 40 CFR 265.31, all facilities must be maintained to minimize the possibility of a hazardous waste release. Pursuant to 40 CFR 265.171, immediate remedial action must be taken whenever a container of hazardous waste begins to leak.

29. Containers of hazardous waste were being stored at four general areas at the Reid facility:

- Inside drum storage warehouse.
- In front of drum storage warehouse.
- At drum processing area.
- At rear of north plant.

Reid's most recent Part A Permit Application indicates that drums of hazardous waste are to be stored only inside of the drum storage warehouse. Reid's Part B Permit Application also indicates that containers of hazardous waste will only be stored inside of the drum storage warehouse. Pursuant to 40 CFR 270.72, a facility may not change its process (areas used for hazardous waste storage) without proper approval.

30. At the time of the inspection, Reid officials estimated that around 1300 drums of hazardous waste were being stored at the facility. Reid's most recent Part A Permit Application lists the total container storage capacity at 27,500 gallons (500 55-gallon drums). Reid's Part B Permit Application also lists a total container storage capacity of 500 55-gallon drums. Pursuant to 40 CFR 270.71, a facility must not exceed the specified storage capacity unless a change is authorized pursuant to 40 CFR 270.72(b).

31. A review of Reid's manifest file shows that a manifest used to ship hazardous waste to Reid from North American Phillips on February 1, 1984, was not signed by a Reid official as acknowledgement of receipt (see attached manifest). All manifests must be signed upon shipment arrival pursuant to 40 CFR 265.71(a.1).

32. At the time of this inspection, Reid was storing drums of ignitable spent alcohols (see photo #96) at the extreme west end of their drum storage warehouse. This is within 50 feet of Reid's western property line. Pursuant to 40 CFR 265.176, all ignitable waste must be stored greater than 50 feet from the property line. Reid has requested a waiver from this requirement as part of their final permit application, but a waiver had not been granted at the time of this inspection.

33. In the past, Reid has picked up and transported to its facility at least two drums containing hazardous waste that were in poor condition (see photo #77). This appears to be a violation of DOT standards.

34. Reid did not maintain adequate aisle spacing at the drum storage areas pursuant to 40 CFR 265.35. At none of the areas where containers of hazardous waste were being kept was there sufficient aisle spacing to allow unobstructed movement or to permit a proper inspection of the drums.

35. During the inspection, many containers of hazardous waste were observed that were stacked in a "precarious" manner (see photos #33, 34, 41, 54, 80 and 84). It appeared that many of the drums stored at Reid could easily become dislodged from their stored position and fall to the ground. Pursuant to 40 CFR 265.173(b), a container must not be stored in any manner which may cause it to rupture or leak.

36. Reid's closure plan does not list an actual year of anticipated closure pursuant to 40 CFR 265.112(a.4). The plan does state that the expected year of closure "would be in 20 years".

37. Reid does not maintain proper security for drums of hazardous waste stored in front of its hazardous waste storage warehouse pursuant to 40 CFR 265.14. These containers are located inside of Trombold Industrial Park (which is fenced) but the gate is not kept locked or monitored and many non-Reid personnel have access to this area.

38. Pursuant to 40 CFR 265.14(c), Reid has not posted warning signs along the following areas of the plant fencelines and storage areas:

- Rear of north plant.
- Rear of drum processing area.
- East side of north plant.
- Around drums in front of warehouse.

39. Reid's closure cost estimate of $9334.50 is based on a maximum waste inventory of 9000 gallons in bulk storage and 375 55-gallon drums. Because of the excessive number of drums of hazardous waste stored at the facility (estimated by Reid officials at 1300 drums), it would not be possible to fully close the facility under present conditions for the amount stated.

40. The closure cost estimate submitted with Reid's Part B Permit Application has not yet been upated. The Part B Permit Application was submitted on March 25, 1983. It is not known when the closure cost estimate was actually calculated. The cost estimate must be updated on a yearly basis pursuant to 40 CFR 265.142(b).

41. Reid is using an irrevocable letter of credit to meet the requirements of 40 CFR 265.143. The wording of this letter of credit is incorrect pursuant to 40 CFR 264.151(d) (see attached photocopy). In addition, Reid has not established a standby trust fund pursuant to 40 CFR 265.143(c.3).

RECOMMENDATIONS

1. It appears that many of the deficiencies noted at Reid are due in part to the excessive number of containers of hazardous waste stored at the facility. This inventory should be reduced as quickly as possible to a level not exceeding that listed in their Part A Permit Application.

2. Reid should ensure that all wastes being blended into a fuel supplement mixture actually have a legitimate heat recovery value.

3. Reid should not store incompatible materials in the same vicinity (e.g. storage of acid and chlorinated or reactive solvents at same location).

4. Reid should thoroughly conduct and properly document regular inspections of their hazardous waste storage areas. Necessary remedial action should be taken as soon as a problem is observed.

5. If they have not already done so, Reid should correct all other program deficiencies noted in this report.

John W. Bosky
Environmental Engineer
Date: 5-2-84
Activity Number: A014

Robert B. Dona
Chief, Field Investigations Section
Date: 5/2/84

Attachments:
Inspection Checklists (23 pages)
Notice of Violation - Yellow Copies (5 pages)
Facility Waste Flow Diagram
Enforcement Guidance Document - Heat Recovery (4 pages)
Facility Inspection Log Sheets (4 pages)
Facility Manifests (6 pages)
Letter of Credit
Confidentiality Notice (2 pages)
Document Receipt
Facility Plot Plans for Photographs (3 pages)
Facility Photographs (30 pages, 122 photographs)